

## **REMARKS**

Claims 1, 8, and 15 have been amended. Claims 1-22 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 103(a) Rejection:**

The Office Action rejected claims 1-3, 5-10, 12-18 and 20-22 under 35 U.S.C. § 103(a) as being unpatentable over Mui et al. (U.S. Publication 2003/0229529) (hereinafter “Mui”) in view of Egli (U.S. Publication 2003/0084120), claims 4, 11 and 19 as being unpatentable over Mui in view of Egli in further view of Hutsch et al. (U.S. Publication 2001/0034771) (hereinafter “Hutsch”). Applicants respectfully traverse this rejection for at least the following reasons.

Regarding claim 1, the cited art fails to teach or suggest *displaying, by a client computer, a first page in a high order presentation language, wherein the first page is associated with an electronic form and comprises an encoding of said form, wherein said form is one of a plurality of electronic forms associated with respective pages*. The Examiner cites Mui, in FIG. 4 and paragraph 216, as teaching displaying a first page in a high order presentation language. Mui is directed to a Business Applications Management System Platform and method for performing enterprise workforce planning, e.g., for identifying employees to use in achieving a goal. The method includes establishing competency records, person records, and building goal profile records, then comparing competencies in person records to required competencies to identify best fit persons for achieving the goal. The cited passage and figure describe the architecture of the platform. As noted by the Examiner, one of the components of the platform is an Interface Server 417, which “contains mechanisms to manipulate various kinds of display style sheets, to generate and execute web links, to manage dynamic content generation and dynamic generation of Javascript”. It appears that the Examiner means to equate the first page of Applicants’ claim with the style sheets described in the cited passage.

However, this passage describes actions taken by a server to manage data. It does not describe anything about a client displaying a page in a high order presentation language.

The Examiner cites FIG. 8C and paragraph 563 as teaching that the first page is associated with a form, and that the form is one of a plurality of forms. The cited passage is part of a description of process by which a web page is developed on the Web Content Server. The process includes the user developing three specifications from an HTML mockup: a data model specification (which contains, e.g., the names of objects that need to be displayed by the interface, and the names of command objects that can be used to retrieve the objects to be displayed), a widget specification (e.g., a list of widgets needed by the page), and a specification of internationalized items (e.g., a list of labels and images to be used on the page). It is not clear whether the Examiner means to equate the first page of Applicants' claim with the HTML mockup described in the cited passage, or with a page under development using the process described in the cited passage (e.g., the view page illustrated in FIG. 8C). However, there is no mapping of the elements described in the cited passage that teaches or suggests *displaying, by a client computer, a first page in a high order presentation language, wherein the first page is associated with an electronic form and comprises an encoding of said form, wherein said form is one of a plurality of electronic forms associated with respective pages.* For example, the three specifications developed by a user from an HTML mockup are not electronic forms associated with respective pages, nor does the HTML mockup or view page comprise (or display) an encoding of one of these three specifications (i.e. one of a plurality of forms, as recited in Applicants' claim).

The Examiner admits that Mui fails to disclose that each of the plurality of forms is mapped to a respective one of a plurality of providers of server-side processing deployed upon a server computer, and relies on Egli to teach this limitation. Egli is directed to a software framework for web-based applications. The framework includes command tags for some generic Web application activities, and can be used to create a custom command tag that can be embedded in a Web page. The cited passages describe, in general terms, that a JVM enables Java bytecode to be executed on any processor or

operating system, and allows two machines on different platforms to connect. The passages also describe JavaServer Pages, a server-side technology. One of the cited passages describes that the Web page designer can name the developer-defined action tag and enter the tag name in the tag library descriptor text file, stating, "... This entry (mapped via 455) identifies the name of the custom JSP tag used by a servlet to invoke the corresponding extended tag action subclass." While this passage describes the use of servlets to invoke actions, it teaches nothing about mapping each of a plurality of forms to a respective one of a plurality of providers of server-side processing (i.e. mapping different forms to different service providers), as required by Applicants' claim.

Further regarding claim 1, the cited art fails to teach or suggest *receiving, by the client computer, input indicating an action to be implemented on the first page*. The Examiner cites Mui, in at least paragraph 308, as teaching this limitation. This passage describes one of the core services provided by Mui's platform: Notification. It states, "...BDK provides the ability to send notifications, such as emails or faxes, to predefined categories of users when the state of identified business objects changes. For example, everyone subscribed to a class may receive a page if the class is cancelled." This passage describes that "a page" (e.g., an SMS message sent to a pager or mobile phone) can be sent to a group of users. It teaches absolutely nothing about a client computer receiving input indicating an action to be implemented on a page displayed in a high order presentation language (i.e. the "first page" of Applicants' claim).

Further regarding claim 1, the cited art fails to teach or suggest *in response to said receiving: generating, by the respective one of the plurality of providers, a second page in a high order presentation language; and providing, by the respective one of the plurality of providers, the second page to the client computer for display*. The Examiner cites FIG. 21 and paragraph 1254 as teaching these limitations. The cited passage describes that a user can view assessment test results or launch an assessment test, for example, by selecting one of the links displayed in FIG. 21. However, there is nothing in this passage that describes a respective provider of server-side processing generating and displaying a second page in response to this selection. There is no such mapping of

forms (or actions therein) to respective providers of server-side processing taught by the cited references.

Further regarding claim 1, the cited art fails to teach or suggest *in response to said calling a corresponding render method and dependent on the performance of said action, said render method performing: populating a name value pair with corresponding data.* The Examiner cites Mui in paragraphs 369 and 533 as teaching these limitations. The first cited passage describes an interface called ISabaXMLRenderable, and states, “This interface... defines a single method, toXML(). Only classes that implement this interface are eligible to act as return types of methods that are going to be invoked from a Java ServerPage.” The second cited passage describes, in general terms, that the Web Content Server can provide the platform’s web content generation engine for use by users to create, render, and present web content, using, e.g., style sheets and web standards for XML and XSL, and generating web content in a variety of formats, such as HTML and WML. These general references to the development of web content teach nothing about this specific limitation of claim 1 involving the populating of a name value pair with corresponding data dependent on the performance of an action on a page displayed in a high order presentation language, as in Applicants’ claim.

In addition, the cited art fails to teach or suggest *wherein at least one of said helper class method and said render method is re-usable in performing a subsequent action on a page.* The Examiner cites Mui as teaching this limitation in paragraph 206. This passage describes the use of metadata to construct information services targeted to individual’s information needs and to manage learning content. It has absolutely nothing to do with re-usable helper class or render methods for performing actions on a page displayed in a high order presentation language.

The cited art also fails to teach or suggest a client computer; and a server computer on which a plurality of providers of server-side processing are deployed... wherein each of the plurality of forms is mapped to a respective one of the plurality of providers. The Examiner cites Mui, in FIG. 4 and paragraph 216 as teaching a client

computer and a server on which a plurality of providers of server-side processing are deployed. The cited passage describes various servers that are components of Mui's platform (e.g., Interface Server 417, Information Server 419, Interconnect Server 423, and Business Server 421). The interface server can communicate with a client 407. However, this passage does not describe a plurality of providers of server-side processing according to the limitations of Applicants' claim, i.e. a plurality of providers of server-side processing that are mapped to respective forms.

To establish a *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP 2143.03. As discussed in detail above, the cited art does not teach or suggest all limitations of Applicants' claim 1.

In addition, the Examiner has failed to show a clear and particular reason for combining Mui and Egli in teaching the specific limitations of claim 1. Applicants assert that the Examiner's stated reason to combine the references is not commensurate with the feature of Egli he is attempting to combine with Mui to result in the claimed invention. The Examiner states that Mui discloses a Java API involving helper class scripts to render required HTML web pages based on user inquiry, and submits, "It would have been obvious to one of ordinary skill in the art at the time of the invention to combine the method for enterprise workforce planning of Mui with software framework for web-based applications of Egli because it is an efficient way to for an operation system to call on any processor regardless of the operating system, hence allowing two machines on different platforms able to connect." The Examiner appears to be referring to paragraph [0035] of Egli, which describes an advantage of using a Java Virtual Machine (JVM). Applicants assert that this has absolutely nothing to do with the limitations of Applicants' claim, nor would the use of a JVM in Mui's enterprise workforce planning platform provide the features the Examiner relies on Egli to teach. The use of a JVM and the fact that it allows operating system calls between machines by translating programming code provides advantages in the system of Egli that have nothing to do with the limitations of claim 1 that are not taught by Mui (e.g., the mapping of forms to respective providers of

server-side processing). Therefore, the Examiner's reason to combine is improper. Applicants further assert that the system of Mui already describes the use of a JVM (in at least paragraphs [0216], [0386], [0430], [0530], and [1206]) without modification to include any features taught by Egli. Therefore, there would be no reason to look to Egli to provide methods for using a JVM. The Examiner's broad, conclusory remarks include nothing about the specific limitations of this claim. Nor do the references themselves include any teaching or suggestion to combine them in a way that would result in Applicant's claimed invention. As discussed above, Mui and Egli do not teach the above-referenced limitations of Applicants' claim. Therefore, even if the references were combined, the combination would not teach or suggest Applicants' claimed invention.

For at least the reasons stated above, Applicants assert that the Examiner has failed to establish a *prima facie* rejection of claim 1.

Independent claims 1, 8, and 15 include limitations similar to those of claim 1 discussed above, and were rejected together with claim 1. Therefore, the arguments presented above apply with equal force to these claims, as well.

Applicants assert that numerous ones of the dependent claims recite further distinctions over the cited art. Applicants traverse the rejection of these claims for at least the reasons given above in regard to the claims from which they depend. However, since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time. Applicants reserve the right to present additional arguments.

## CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-91000/RCK.

Respectfully submitted,

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Date: June 3, 2010